

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HIGHLAND HOLDINGS, INC., a
Washington corporation,

Plaintiff,

v.

INDIVA, INC., a Canadian corporation,

Defendant.

Cause No. 2:21-cv-00065-RSM

STIPULATED MOTION TO EXTEND
CERTAIN PRE-TRIAL DEADLINES
AND ORDER

**NOTE ON MOTION CALENDAR:
June 28, 2021**

COME NOW the parties to this case, and jointly move that this Court extend the initial scheduling deadlines in its Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, dated February 16, 2021 [docket # 4], as follows:

INITIAL SCHEDULING DATES

Event:	Deadline (per February 16, 2021 Order):	Proposed Deadline:
Deadline for FRCP 26(f) Conference	03-16-2021	August 16, 2021
Initial Disclosures Pursuant to FRCP 26(a)(1):	03-23-2021	August 23, 2021
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	03-30-2021	August 30, 2021

1 The reason for the request for an extension is that the defendant, Indiva, Inc., is a Canadian
2 company with its principal place of business in London, Ontario, Canada. Therefore, international
3 service of process was made through the Convention on the Service Abroad of Judicial and
4 Extrajudicial Documents in Civil or Commercial Matters (the “Hague Convention,” located at FRCP
5 4, footnote) and took several months to accomplish. Also, the Covid-19 worldwide pandemic served
6 as a delay to this international service of process. Service was finally made on May 14, 2021 [docket
7 # 6] and local counsel for defendant entered their Notice of Appearance on June 2, 2021 [docket #5].
8 Additionally, the parties are engaged in discussions regarding potential resolution and request the
9 extension of the above deadlines to allow them to continue to pursue settlement discussions without
10 the need to devote time and resources to potential litigation.
11

12 The parties, as evidenced by the electronic signatures below, are in agreement to this
13 extension of time.

14 Respectfully submitted this 28th day of June, 2021.

15 VI JEAN RENO

15 CORR CRONIN LLP

16
17 /s/ Vi Jean Reno
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24 Email: twilliams@corrchronin.com
25 Attorneys for Defendant Indiva, Inc.

1 **ORDER**

2 The parties having so stipulated, and the Court finding good cause for entry hereof,

3 NOW THEREFORE, IT IS HEREBY ORDERED that the case schedule be reset in
4 accordance with the above listed dates.

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6 DATED this 29th day of June, 2021.

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9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE
11

12 Presented by:

13
14 /s/ Vi Jean Reno
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4 CERTIFICATE OF SERVICE

5 I hereby certify that on June 28, 2021, I
6 electronically filed the foregoing with the Clerk of
7 the Court using the CM/ECF system which will
8 send notification of such filing to:

9 Todd T. Williams of Corr Cronin LLP
10 Attorneys for Defendant Indiva, Inc.

11 Dated this 28th day of June, 2021.

12 /s/ Vi Jean Reno

13 Vi Jean Reno
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